

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

MICHAEL BRENT KOVACH,)	
)	
Plaintiff,)	
)	
Vs.)	Civil Action No.: 1:06cv159-MEF
)	
MID SOUTH HOME CARE)	
SERVICES, INC.,)	
)	
Defendant.)	

MOTION FOR ENLARGMENT OF DISPOSITIVE MOTION DEADLINE

Defendant moves the court for an amendment to the Uniform Scheduling Order (a) enlarging the dispositive motion filing deadline by twenty (20) days, to and including November 13, 2006, and, (b) extending the time for response thereto by a like period, upon the following grounds:

1. The parties expect to conclude depositions on October 20, 2006. Counsel for the defendant was out of the office unexpectedly for considerable periods of time during the preceding ninety days due to multiple family illnesses of a very serious nature, making it difficult to schedule depositions.
2. The dispositive motion deadline is October 24, 2006. The deposition transcripts are not likely to be available, at best, for several days thereafter.
3. Plaintiff's counsel has been consulted, and has authorized this motion to reflect that he does not object to the requested enlargement provided response time is enlarged for a like period.

/s/ William C. Carn, III
William C. Carn, III (ASB-1166-A54W)
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Certificate of Service

I hereby certify that on October 6, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Jon C. Goldfarb.

/s/ William C. Carn, III

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